



February 23, 2024

VIA ECF

The Honorable Dale E. Ho
U.S. District Judge
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. M/Y Amadea, No. 23-cv-9304 (DEH)

Dear Judge Ho:

We represent Claimants in the above-referenced matter. Later today, Claimants intend to file their opposition to the government's Motion for Interlocutory Sale. In support of their motion, Claimants intend to file documents with names and other identifying information of former crew members redacted, and now seek leave of the Court to permit Claimants to do so. These documents include two affidavits of the former crew members and the Declaration of Anthony Rossitto, which references those crew member affidavits.

We redacted the crew members' names and other personal identifying information in the above-listed documents, in order to protect their identities from the public. The government has made allegations of criminal conduct against at least one of these individuals in its Amended Complaint, and has chosen not to reveal their names. Former crew members of the Amadea have suffered career consequences and worse, based on their prior work on the Amadea or related vessels. We respectfully request that the Court permit Claimants to publicly-file the redacted versions of these documents. Pursuant to Your Honor's Individual Rules, simultaneous to this letter, we are filing the redacted versions of the above-listed documents on the public docket, and the unredacted versions with highlights under seal.

We appreciate the Court's consideration of this request.

Respectfully Submitted,

/s/ Adam C. Ford

Adam C. Ford
Renée L. Jarusinsky
Ford O'Brien Landy LLP
Counsel for Claimants Eduard
Yurievich Khudainatov and
Millemarin Investments Ltd.